

**Hearing Date: November 19, 2019**  
**Hearing Time: 10:00 a.m. ET**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**Jointly Administered**

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**JOINDER OF THE NAS BABIES AD HOC COMMITTEE  
TO THE OBJECTION OF AD HOC GROUP OF INDIVIDUAL VICTIMS OF PURDUE  
PHARMA L.P. ET AL. TO DEBTORS' MOTION TO ASSUME THE PREPETITION  
REIMBURSEMENT AGREEMENT WITH THE AD HOC COMMITTEE, AND TO PAY  
THE FEES AND EXPENSES OF THE AD HOC COMMITTEE'S PROFESSIONALS**

**TO: THE HONORABLE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE:**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

The ad hoc committee that represents guardians who are responsible for the legal interests of children born with Neonatal Abstinence Syndrome (“NAS”) and various birth defects (the “NAS Babies Ad Hoc Committee”), through their undersigned counsel, Tarter Krinsky & Drogin LLP, hereby joins in the “*Objection of Ad Hoc Group of Individual Victims of Purdue Pharma L.P.*” ECF Dkt. No. 454 (the “Individual Objection”). In support thereof the NAS Babies Ad Hoc Committee states as follows:

### **JOINDER**

1. On October 22, 2019, pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, the NAS Babies Ad Hoc Committee filed its verified statement. [Docket No. 341].

2. The NAS Babies Ad Hoc Committee represents guardians who are responsible for the babies diagnosed at birth with NAS due solely to their birth mother’s use during pregnancy of opioids manufactured by Purdue among other entities.

3. Nationwide, it is reported that a baby is born diagnosed with NAS every 15 minutes, nearly 700 babies monthly (the “NAS Babies”). Sadly, that trend started nearly two decades ago and has shown little sign of abating. Admittedly, not every mother that delivers a child diagnosed at birth with NAS had used branded pharmaceuticals manufactured by Purdue. Nonetheless, under the totality of the circumstances, the NAS Babies Ad Hoc Committee represents the legal interests of upwards of hundreds of thousands of opioid affected children.

4. In the aggregate, the recovery of reasonable and necessary costs associated with damages and lifelong care needs of the NAS Babies places this unique group of individuals at the top of the list of creditors; in fact, the NAS Babies’ claims will likely exceed, in the aggregate, the claims of all other known creditors in the Debtors’ cases.

5. The legal representatives of the NAS Babies Ad Hoc Committee and their associates are responsible for filing 87 actions on behalf of NAS Babies, including class actions covering 34 individual states and a national class.

6. The NAS Babies Ad Hoc Committee joins in the arguments raised in the Individual Objection and adopts and incorporates such arguments as if more fully set forth herein.<sup>2</sup>

7. The NAS Babies Ad Hoc Committee respectfully requests the right to present argument on this Joinder to the Individual Objection at the time of hearing, and that this right to present argument continues and remains even if the Ad Hoc Group of Individual Victims of Purdue Pharma L.P. withdraws or otherwise resolves the Individual Objection.

8. The NAS Babies Ad Hoc Committee reserves the right to file a joinder to any other objections which may be filed to the Debtors' *Motion to Assume the Prepetition Reimbursement Agreement with the Ad Hoc Committee*. [Docket No. 394].

**WHEREFORE**, the NAS Babies Ad Hoc Committee respectfully requests the Court (i) sustain the Individual Objection; and (ii) grant such other and further relief as the Court deems just and proper.

Dated: November 12, 2019  
New York, New York

**TARTER KRINSKY & DROGIN LLP**  
*Counsel for NAS Babies Ad Hoc Committee*

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<sup>2</sup> Paragraph 1 of the Individual Objection states "individual victims have arguably suffered the largest amount of damage at the hands of the Debtors." The NAS Babies Ad Hoc Committee interprets this statement to include the NAS Babies claims as the NAS Babies are individuals.